

**TRIGGERS FOCUS GROUP  
TIMING OF MRP REVISIONS  
PENDING RECOMMENDATION #6  
5 April 2006**

**PROBLEM STATEMENT:** The Reporting Requirements section of the draft Coalition Group MRP requires that a Coalition must submit a Monitoring and Reporting Program Plan to the Regional Board. Specifically, the draft MRP states that the Coalition Group MRPP must:

*“clearly demonstrate: 1) compliance with all monitoring requirements as described in this MRP; 2) sufficient number of monitoring sites based on watershed characteristics, flow monitoring, and frequency of sample collection to allow for the calculation of load discharged for each parameter monitored; and 3) the use of proper sampling techniques and laboratory procedures to ensure a sample is representative of the site and is preformed in the laboratory using approved methodologies.”*

Whenever the Regional Board MRP is revised or modified, a Coalition must respond by formally amending or revising their MRPP. Because modifications to the current MRPP have been relatively minor, amending the MRPP by submission of a letter to the Regional Board has been sufficient. However, upcoming changes in the tentative MRP may require substantial modifications of a Coalition MRPP. Currently, no time schedule for MRPP revisions or amendments is provided in the Regional Board’s tentative MRP.

It is anticipated that modifications to a Coalition’s MRPP in response to the tentative MRP could take a substantial amount of time and may result in modifications to the Coalition’s QAPP. Modifications of a monitoring program cannot be made without an approved MRPP and an approved QAPP, and if the process of MRPP/QAPP modification and approval takes several months, the Coalition could be out of compliance with the Regional Board MRP. These potential problems suggest that there needs to be explicit language in the MRP that addresses the length of time allowed for MRPP revisions. Additionally there is a need for explicit language concerning a Coalition monitoring program’s responsibilities for the time between adoption of a new MRP and approval of the Coalition MRPP.

Therefore, the Triggers Focus Group is making the following recommendation to the TIC:

**RECOMMENDATION:**

Recognizing that the Irrigated Lands Conditional Waiver Program is anticipated to be a long-running program, the need for immediate modification of a Coalition Group MRP is not critical. It is recommended that a Coalition’s revised MRPP be submitted within 6 months from the date of the approval of the Regional Board’s revised MRP. During the period, between revision and approval, the Coalition will continue to monitor in accordance with the most recently approved Coalition MRPP.

It is recommended that the narrative in Section III A. of the draft Coalition Group MRP include:

*“If the Regional Board revises the Irrigated Lands Conditional Waiver Program MRP, the Coalitions shall submit a revised Monitoring and Reporting Program Plan to the Regional Board within six (6) months from the time of the MRP approval. In the period between MRP approval and the approval of the revised MRPP, the Coalition will maintain its monitoring program as established under the previous MRP.”*